

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

State of New York, *et al.*

*Plaintiffs,*

v.

Case No. 1:25-cv-1144-JAV

U.S. Department of the Treasury, *et. al.*

*Defendants.*

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I, Vona S. Robinson, declare under penalty of perjury:

1. I currently serve as the Deputy Assistant Commissioner for Federal Disbursement Services at the Bureau of the Fiscal Service (BFS or the Bureau). I have been employed in this role since October 2022; prior to that, I served as Executive Director Federal Disbursement Services from February 2019 to October 2022. I report to Linda Chero, Assistant Commissioner, Disbursing and Debt Management. I am a career civil servant.
2. In my current role, I oversee, among other things, the Bureau's Federal Payment Operations. My office is responsible for disbursing 87.8% of the U.S. Government's payments valued at 5.46 trillion dollars annually. My office works closely with BFS's Office of Transformation and Modernization, which is headed by Deputy Commissioner Joseph Gioeli III. Mr. Gioeli's office is responsible for the integrity, operational efficiency, and security of the technological infrastructure, whereas the Office for Disbursement Services is responsible for overseeing the business processing of payment requests that come into BFS's payment systems.
3. In this role, I have extensive knowledge of the Bureau's business processes for the disbursement of federal payments. Information in this declaration is based on my personal

knowledge and information made available to me in the course of my official duties. I provide this declaration in support of Defendants' Reply Memorandum of Law in Support of Motion to Partially Dissolve the Preliminary Injunction.

4. I have reviewed the first declaration of Mr. Gioeli, docketed as ECF No. 34, in which he discussed the following Bureau payment systems: Payment Automation Manager (PAM), Secure Payment System (SPS), Automated Standard Application for Payments (ASAP), International Treasury Services (ITS.gov), and the Central Accounting and Reporting System (CARS). *Id.* ¶¶ 5-10.
5. The Bureau's Federal Disbursement Services utilizes and maintains the first four systems: PAM, SPS, ASAP, and ITS.gov. I am familiar with these systems' functions, and the trainings provided by Federal Disbursement Services to individuals whose job duties involve accessing those systems.
6. I have reviewed the second declaration of Mr. Gioeli, docketed as ECF No. 98-2. In that declaration, Mr. Gioeli discussed various "Basic IT Security Trainings" that "[a]ll Bureau employees and contractors who have been granted logical access to any Bureau computer system (*i.e.*, permission given to users to access specific parts of a computer system or software) are required, within 60 days of gaining that access, (and then annually) to complete." *Id.* ¶ 10. Mr. Gioeli also noted that individuals seeking access to Bureau payment systems, including PAM, SPS, ASAP, and ITS.gov, must also complete these Basic IT Security Trainings within 60 days of acquiring access to the payment systems. *Id.* ¶ 14.
7. I have reviewed the declaration of Michael J. Wenzler, the Associate Chief Human Capital Officer for Executive and Human Capital Services at the Departmental Offices of the Department of the Treasury, docketed as ECF No. 98-3. There, Mr. Wenzler stated that Ryan

Wunderly, a Treasury employee, has completed the Basic IT Security Trainings. *See id.* ¶¶ 18, 22.

8. Federal Disbursement Services conducts additional, “hands-on” trainings for individuals whose job duties involve access to PAM, SPS, ASAP, and ITS.gov. However, those trainings can only occur upon the individual obtaining, at a minimum, “over-the-shoulder” access to those systems.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 3/17/2025

Signed: Vona S. Robinson

Vona S. Robinson  
Deputy Assistant Commissioner – Federal  
Disbursement Services

Bureau of the Fiscal Service

United States Department of the Treasury